



Department of Energy

ROCKY FLATS OFFICE
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FEB 19 1993

93-DOE-02126

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
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Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

In a meeting on February 2, 1993, our staffs discussed a transfer line used in the past and is intended to be used again to ship water from the Solar Evaporation Ponds to Building 374. In preparing to tie the new Modular Tanks (per the Interim Measure/Interim Remedial Action (IM/IRA) Decision Document for the Solar Evaporation Ponds, Operable Unit No. 4, April, 1992) to the line, we discovered that a few sections of the line lacked adequate secondary containment. We are in the process of installing secondary containment or providing for the compensatory measure of visual inspections for most of these sections. In several places, however, the line penetrates building walls. We propose to visually inspect the walls at the points of penetration as a compensatory measure. Details on the transfer line are attached.

Your staff indicated that our compensatory measures are acceptable, and urged us to resume shipping pond water to Building 374 as soon as possible. Shipping the water will facilitate achieving DOE's commitment to remove excess water from the ponds, and DOE is anxious to continue with the operation.

The transfer line will be ready to return to service by February 25, 1993. Based on your staff's encouragement, we would like to begin transferring pond water to Building 374 for treatment immediately thereafter. Please provide your written approval as soon as possible to allow us to begin transferring pond water.

ADMIN RECORD


DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

A-DU04-000463

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For further discussion of this issue, please contact Frazer Lockhart at 966-7846.

Sincerely,


James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

Enclosure

cc:

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Attachment 1

Transfer Line Secondary Containment and Compensatory Measures

Location:

The transfer line is an existing water transfer pipeline at the Rocky Flats Plant. The line services several areas, and runs from Building 910 through several 700-area buildings to the Building 374 waste receiving tanks.

Description:

The transfer line is a three-inch carbon steel pipe. The Solar Ponds tie-in to the line is via a double-walled polyethylene pipe that runs below-grade from the modular tanks to Building 910; and above-ground from Building 910, between the A and B pond cells, along the south side of the C pond, and down the hill to Building 774. From Building 774, the line runs through other 700-area buildings, enters the valve-vault system, and ends at the 231 tanks at Building 374. Exterior to buildings, the line has secondary containment. Within buildings, secondary containment is provided by the building-envelopes for most of the line. The line passes through several interior walls: three solid concrete walls in Building 374; four solid concrete walls in Building 774; eight cinder block walls in Building 771; and two cinder block, one solid concrete, and six non-structural dry-walls in Building 776. All the buildings have solid concrete floors. In all cases where the line passes through an exterior wall, the line is double-contained.

Where practical and within the time allotted by the schedule to meet the milestone dates presented to the Colorado Department of Health (CDH) in the Department of Energy's (DOE) letter of January 22, engineered measures for secondary containment are being installed within building where such containment is lacking; for example, by providing secondary containment housing around valves in Building 771.

In Buildings 771, 774, 776, and 778, single-walled sections of the line exposed in the ceilings of rooms will be visually inspected. Any leak from these sections would be entirely within the building.

At each wall penetration lacking secondary containment, a wall face can be visually inspected. The wall-face surrounding the line will be inspected by building personnel once per shift when the transfer line is in use.

Reason to Use Line:

Use of the transfer line is necessary to fulfill DOE's commitments in the amended IM/IRA, which is currently being finalized by the DOE and the regulators. Use of the line will allow DOE to expedite ceasing placement of ITS water into the Solar Ponds. Use of the line will also expedite the removal of excess water from the Solar Ponds,

which will diminish the hydraulic driver for contamination in the pond sludge, and facilitate remedial investigations for Operable Unit 4.

Approval to Use Line:

DOE has received CDH's verbal approval to use the line with the compensatory measures described above. To avoid confusion, DOE requests written approval prior to using the line to transfer pond water (and later, Interceptor Trench System water) to Building 374. Please provide your written approval for our records.